-03-mb-01570-GBD-SN Document 2076 Filed 04/07/08 Page 1 of 2 USDC SDNY MARTIN F. MCMAHON & ASSOCIATES DOCUMENT ELECTRONICALLY FILED 1150 CONNECTICUT AVENUE, N.W. SUITE 900 WASHINGTON, D.C. 20036 MEMO ENDO Of Counsel Established 1978 Admitted in District of Columbia and Admitted in District of Columbia, New York and U.S. District Court of Maryland Maryland TELEPHONE (202) 862-4343 FACSIMILE (202) 828-4130 CHRISTOPHER D. BROWN CHRISTINE M. HILGEMAN Of Counsel Associate Admitted in Virginia Admitted in District of Columbia and www.martinmcmahonlaw.com Maryland JAMES LUDWIG ROBERT MANCE Of Counsel Of Counsel Admitted in District of Columbia and Maryland Mr. Corter's 4/7/08 letter outlenes the 1880es so I look forward to Mr. McMahon's attendance. The conference has been moved up to SENT VIA FEDERAL EXPRESS APR D 4 2008 Fulum, USMIS, 4/1/08 FRANK MAAS

The Honorable Frank Maas United States Magistrate Judge United States Court for the Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Room 740 New York, NY 10007-1312

U.S. MAGISTRATE JUDGE

Re: In re Terrorist Attacks on September 11, 2001, MDL 03-1570 (GBD) (FM)

Dear Judge Maas;

This letter is to notify the Court that upon review of your March 19, 2008 Order scheduling a Discovery Conference on April 11, 2008, and upon review of the discovery disputes referred to your Court per Judge Daniels' Orders dated March 14, 2008, it appears that none of our firm's clients (Defendants International Islamic Relief Organization of Saudi Arabia, Muslim World League, Sanabel Al-Kheer and/or other Sanabel/Sana-Bell entities, Rabita Trust, Wael Jelaidan, Dallah Avco, Tadamon Bank, Al Shamal Bank, Al Agsa) have any discovery disputes pending before the Court at this time. Thus, we respectfully request that the presence of our firm be waived at the April 11, 2008 Discovery Conference since our clients are not involved in any active dispute.

When we contacted your chambers on March 21, 2008, we were informed that our presence at the hearing was requested by the Plaintiffs. We were not informed, however, of the reason that the Plaintiffs requested our appearance, and we remain unclear as to our role in the hearing. While we maintain that our presence at the hearing is not necessary since there are no discovery disputes involving our clients presently before this Court, if it is not possible to excuse our firm from the hearing, please advise us as to the issues which we will be expected to address. We sincerely appreciate your assistance in this matter.

Very Truly Yours,

Martin F. McMahon, Esq.

CC: Plaintiffs' Executive Committee, Defendants' Executive Committee